

United States Courts
Southern District of Texas
FILED

OCT 27 2021

Nathan Ochsner, Clerk of Court

PRISONER'S CIVIL RIGHTS COMPLAINT (Rev. 04/2021)

IN THE UNITED STATES DISTRICT COURT
FOR THE Southern DISTRICT OF TEXAS
Manvel DIVISION

Kelly Elaine Slayton
Plaintiff's Name and ID Number SPN #03078865

Harris Co. Jail 1200 Baker Street
Place of Confinement Houston, TX

77002-7206

CASE NO. _____
(Clerk will assign the number)

v.

Gregory Eugene Hunter - 9923
Defendant's Name and Address Pattemore Rd

Christina Dorrough -
Defendant's Name and Address Manvel, TX
providence uptown

Houston Area Women's
Defendant's Name and Address apartments
(DO NOT USE "ET AL.") Center (HAWC)

INSTRUCTIONS - READ CAREFULLY

NOTICE:

Your complaint is subject to dismissal unless it conforms to these instructions and this form.

1. To start an action you must file an original and one copy of your complaint with the court. You should keep a copy of the complaint for your own records.
2. Your complaint must be legibly handwritten, in ink, or typewritten. You, the plaintiff, must sign and declare under penalty of perjury that the facts are correct. If you need additional space, **DO NOT USE THE REVERSE SIDE OR BACK SIDE OF ANY PAGE.** ATTACH AN ADDITIONAL BLANK PAGE AND WRITE ON IT.
3. You must file a separate complaint for each claim you have unless the various claims are all related to the same incident or issue or are all against the same defendant, Rule 18, Federal Rules of Civil Procedure. Make a short and plain statement of your claim, Rule 8, Federal Rules of Civil Procedure.
4. When these forms are completed, mail the original and one copy to the clerk of the United States district court for the appropriate district of Texas in the division where one or more named defendants are located, or where the incident giving rise to your claim for relief occurred. If you are confined in the Texas Department of Criminal Justice, Correctional Institutions Division (TDCJ-CID), the list labeled as "VENUE LIST" is posted in your unit law library. It is a list of the Texas prison units indicating the appropriate district court, the division and an address list of the divisional clerks.

FILING FEE AND IN FORMA PAUPERIS (IFP)

1. In order for your complaint to be filed, it must be accompanied by the statutory filing fee of \$350.00 plus an administrative fee of \$52.00 for a total fee of \$402.00.
2. If you do not have the necessary funds to pay the fee in full at this time, you may request permission to proceed *in forma pauperis*. In this event you must complete the application to proceed *in forma pauperis*, setting forth information to establish your inability to prepay the fees and costs or give security therefor. You must also include a current six-month history of your inmate trust account. If you are an inmate in TDCJ-CID, you can acquire the application to proceed *in forma pauperis* and the certificate of inmate trust account, also known as *in forma pauperis* data sheet, from the law library at your prison unit.
3. The Prison Litigation Reform Act of 1995 (PLRA) provides "...if a prisoner brings a civil action or files an appeal *in forma pauperis*, the prisoner shall be required to pay the full amount of a filing fee." See 28 U.S.C. § 1915. Thus, the court is required to assess and, when funds exist, collect, the entire filing fee or an initial partial filing fee and monthly installments until the entire amount of the filing fee has been paid by the prisoner. If you submit the application to proceed *in forma pauperis*, the court will apply 28 U.S.C. § 1915 and, if appropriate, assess and collect the entire filing fee or an initial partial filing fee, then monthly installments from your inmate trust account, until the entire \$350.00 statutory filing fee has been paid. (The \$52.00 administrative fee does not apply to cases proceeding *in forma pauperis*.)
4. If you intend to seek *in forma pauperis* status, do not send your complaint without an application to proceed *in forma pauperis* and the certificate of inmate trust account. Complete all essential paperwork before submitting it to the court.

CHANGE OF ADDRESS

It is your responsibility to inform the court of any change of address and its effective date. Such notice should be marked "NOTICE TO THE COURT OF CHANGE OF ADDRESS" and shall not include any motion for any other relief. Failure to file a NOTICE TO THE COURT OF CHANGE OF ADDRESS may result in the dismissal of your complaint pursuant to Rule 41(b), Federal Rules of Civil Procedure.

I. PREVIOUS LAWSUITS:

- A. Have you filed *any* other lawsuit in state or federal court relating to your imprisonment? X YES NO
- B. If your answer to "A" is "yes," describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, giving the same information.)
 1. Approximate date of filing lawsuit: October 14, 2021
 2. Parties to previous lawsuit:

Plaintiff(s) Kelly Elaine Stayton SPN #03078865

Defendant(s) Harris County Jail, et al.
 3. Court: (If federal, name the district; if state, name the county.) Southern District, Houston Division
 4. Cause number: 4:21-CV-02553
 5. Name of judge to whom case was assigned: Charles Eskridge
 6. Disposition: (Was the case dismissed, appealed, still pending?) Denied without prejudice
 7. Approximate date of disposition: October 18, 2021

II. PLACE OF PRESENT CONFINEMENT: Harris County Jail
1200 Baker street
Houston, Tx
77002-1206

III. EXHAUSTION OF GRIEVANCE PROCEDURES:

Have you exhausted all steps of the institutional grievance procedure? ☒ YES ☐ NO

Attach a copy of your final step of the grievance procedure with the response supplied by the institution.

IV. PARTIES TO THIS SUIT:

A. Name and address of plaintiff: Kelly Elaine Slayton SPN# 03018565
Harris County Jail at 1200 Baker Street
Houston, Texas 77002-1200

B. Full name of each defendant, his official position, his place of employment, and his full mailing address.

Defendant #1: Gregory Eugene Hunter at 9923
Patterson Road in Manvel, Texas.

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

He manipulated me into prostitution and solicitation acts.

Defendant #2: Christina Dorough (Kenzie) at
Providence uptown apartments

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

She stripped, escorted, and also prostituted for Gregory
hiding evidence of the death and murder of others.
 Defendant #3: (Manuel) Houston Area
Women's shelter

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

July 2020 I sought safety and they turned a blind eye
to the chapter

Defendant #4: David Ashley of Galveston
Masonic lodge
pressuring to buy sex from me

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

Knowing and seeing factual evidence I stressed
without helping but hiding evidence

Defendant #5: Manuel police department for not
arresting my trafficker allowing him 14+ Bonds

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

Allowing Gregory 14+ bonds to date to enable
more trafficking acts and harm to others.

V. STATEMENT OF CLAIM:

State here in a short and plain statement the facts of your case, that is, what happened, where did it happen, when did it happen, and who was involved. Describe how each defendant is involved. You need not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach extra pages if necessary, but remember the complaint must be stated briefly and concisely. IF YOU VIOLATE THIS RULE, THE COURT MAY STRIKE YOUR COMPLAINT.

Gregory Hunter posed as a big million dollar artist who owns Concrete Companies, car shops he "rents" out to prostitute "girlfriends" and controls women financially, by force, and to earn income by means of rape too. He tries to earn social status and plays the role as a polygamist, hiding bodies, bonding himself and his victims out. He pays off police and has them spy on women who escape him (Christina Dorough and myself). Houston Area Women's Shelter only contributed to the sex selling industry.

VI. RELIEF:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I want compensation, a full reimbursement of court fees, and a full investigation, appropriately.

VII. GENERAL BACKGROUND INFORMATION:

A. State, in complete form, all names you have ever used or been known by including any and all aliases.

Kelly Elaine Slayton, and Kelly Elaine Clark

B. List all TDCJ-CID identification numbers you have ever been assigned and all other state or federal prison or FBI numbers ever assigned to you.

SPN # 03078865

VIII. SANCTIONS:

A. Have you been sanctioned by any court as a result of any lawsuit you have filed? ☐ YES ☒ NO

B. If your answer is "yes," give the following information for every lawsuit in which sanctions were imposed. (If more than one, use another piece of paper and answer the same questions.)

1. Court that imposed sanctions (if federal, give the district and division): _____

2. Case number: _____

3. Approximate date sanctions were imposed: _____

4. Have the sanctions been lifted or otherwise satisfied? ☐ YES ☒ NO

C. Has any court ever warned or notified you that sanctions could be imposed? YES XNO

D. If your answer is "yes," give the following information for every lawsuit in which a warning was issued. (If more than one, use another piece of paper and answer the same questions.)

1. Court that issued warning (if federal, give the district and division): _____
2. Case number: _____
3. Approximate date warning was issued: _____

Executed on: 10/22/2021
DATE

Kelly Elaine Slayton
Kelly Elaine Slayton
(Signature of Plaintiff)

PLAINTIFF'S DECLARATIONS

1. I declare under penalty of perjury all facts presented in this complaint and attachments thereto are true and correct.
2. I understand, if I am released or transferred, it is my responsibility to keep the court informed of my current mailing address and failure to do so may result in the dismissal of this lawsuit.
3. I understand I must exhaust all available administrative remedies prior to filing this lawsuit.
4. I understand I am prohibited from bringing an *in forma pauperis* lawsuit if I have brought three or more civil actions or appeals (from a judgment in a civil action) in a court of the United States while incarcerated or detained in any facility, which lawsuits were dismissed on the ground they were frivolous, malicious, or failed to state a claim upon which relief may be granted, unless I am under imminent danger of serious physical injury.
5. I understand even if I am allowed to proceed without prepayment of costs, I am responsible for the entire filing fee and costs assessed by the court, which shall be deducted in accordance with the law from my inmate trust account by my custodian until the filing fee is paid.

Signed this 22nd day of October, 20 21.
(Day) (month) (year)

Kelly Elaine Slayton
Kelly Elaine Slayton
(Signature of Plaintiff)

WARNING: Plaintiff is advised any false or deliberately misleading information provided in response to the above questions may result in the imposition of sanctions. The sanctions the court may impose include, but are not limited to, monetary sanctions and the dismissal of this action with prejudice.

HARRIS COUNTY SHERIFF'S OFFICE JAIL

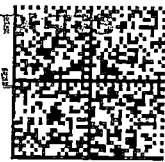
Name: Kelly E. Slayton
SPN: 03078865 Cell: 4F1
Street 1200 Baker street

HOUSTON, TEXAS 77002



NORTH HOUSTON TEXAS 77060

25 OCT 2021 PM 1:11



U.S. POSTAGE



ZIP 77002
02 4W
000036878

Nathan Ochser
Clerk of Court (Legal mail)
P.O. Box 61010
Houston, TX 77208

INDIGENT

77208-101010

